

Exhibit F

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November 29, 2011

VIA ELECTRONIC MAIL

Brett Anders
Jackson Lewis LLP
andersb@jacksonlewis.com

Re: da Silva Moore, et al. v. Publicis Groupe SA, et al., Civ. No. 11-CV-1279

Dear Brett,

We write in response to your November 18, 2011 letter regarding Defendant MSL's proposed keywords and search terms. Your letter contains very little information regarding MSL's proposed methodology for electronic mail discovery. Therefore, we have several questions we would like you to address in order to allow us to better understand and respond to your proposal.

I. Custodian List

Your November 18 letter includes a proposed list of custodians but provides no explanation of how you generated the list. At no point did MSL solicit the input of Plaintiffs regarding their custodian list. Instead, MSL's proposed custodian list appears to ignore Plaintiffs' suggested custodian groups of "key players" outlined in our November 9, 2011 letter. MSL's list also includes some custodians multiple times. For example, Tara Lilien is listed as three separate custodians: "Lilien, Tara," "Kashanian, Tara," and "Lillien, Tara."

We have the following inquiries regarding MSL's proposed custodian list (MSL Ex. A):

1. Please indicate whether any other custodians' email data has been loaded into the Axcelerate system aside from the email data of those custodians reflected in MSL Ex. A.
2. Are the document counts provided in MSL Ex. A reflective of the number of emails per custodian or total documents including emails and their attachments?
3. Are the document counts provided in MSL Ex. A reported on a post-deduplicated basis?

Please see Plaintiffs' list of electronic mail custodians, which includes key players described in Plaintiffs' November 9 letter, attached hereto as Exhibit 1. This is a preliminary list, and Plaintiffs reserve the right to amend this list without prejudice as the case progresses.

II. Search Terms

We also feel that MSL's proposed list of keywords and search terms is inadequate as it will not likely capture evidence germane to Plaintiffs' gender discrimination class claims. Further, MSL's proposed keywords do not cover different variations of the same root words. For example, MSL's keyword No. 1, "Reorganization," would not hit on the phrases "reorg," "reorganized," or "reorganizations." Finally, many of the keywords also appear on MSL's proposed custodian list. Running a search in a custodian's mailbox that bears that custodian's name would generate hits on every single email without targeting the desired subject matter relevant to this case.

We have the following inquiries regarding MSL's proposed keyword list and hit list (MSL Exs. B and D):

4. Please indicate whether "hits" as reported in MSL Ex. D refers to the number of documents responsive to each search or the number of times the keyword or search term was found among the documents that were searched.
5. Please confirm that you searched all 2,651,447 documents loaded into Axcelerate when generating your reports.
6. Please explain why the names of custodians are used as search terms. Please also explain why you used different search methods depending on custodian. For example, some searches are based solely on first or last name while others are based on first and last name.
7. We assume that quotation marks in a search term limit the search to the literal string of characters between the quotes (e.g. "Discrimination"). Please explain why you did not account for variations of the term (e.g. discriminate, discriminatory). Furthermore, please indicate what, if any, effect the use of capitalization has on the search. For example, does "discrimination" and "Discrimination" generate the same results?
8. Please explain why some search terms contain quotation marks while others do not (e.g. Nancy /2 Glick versus Nancy /2 "Brennan").
9. Please confirm that searches containing proximity operators (e.g. /2) are not limited by the order in which the words appear within the search term. Rather, searches using search terms with proximity operators should be bidirectional.
10. Please explain how proximity operators work generally within the Axcelerate system.
11. Are the document counts provided in MSL Ex. D reported on a post-deduplicated basis?

Please see Plaintiffs' list of search terms attached hereto as Exhibit 2, which is aimed at extracting information germane to this case from the custodians' electronic mailboxes. This is a preliminary list, and Plaintiffs reserve the right to amend this list without prejudice as the case progresses.

III. Search Methods

In your November 18 letter, you describe "subset searches," using combinations of keyword searches and "broad categories of potentially discoverable documents." We are puzzled by your choice to pursue this type of search method, and you offer no explanation regarding how you chose the combinations of keywords searches. Your letter also describes your review of responsiveness but offers no guidance regarding the methodology used in order to define responsiveness. You further describe a "wildcard and/or connectors" search but do not explain how and in what instances you used these tools.

We have the following inquiries regarding MSL's proposed subset searches (MSL Exs. C and E):

12. How did you determine which search terms would be used as the "initial term" as opposed to the "combined with" term in MSL Ex. C?
13. MSL Ex. D contains terms and their syntax, while MSL Ex. C does not. Please explain how this difference affected your searches.
14. Did you structure searches of initial terms and "combined with" terms using the AND Boolean operator? If so, why do combinations of terms when searched in the inverse yield different results? For example, when you searched for the word "training" in combination with the phrase "work/life balance" 1,031 hits were reported. When the search was performed in the inverse order using the same criteria, 1,223 hits were reported.
15. What sampling method did you employ to determine how many of the documents returned by the combination searches in MSL Ex. C to review?
16. Please confirm that the total number of documents you deemed responsive in MSL Ex. D is the same number of documents you categorized in MSL Ex. E. For example, "Vickie" resulted in 292,868 "hits." Of the .55% of "hit" documents already reviewed, you deemed 57.45% to be responsive. Do the 571 documents categorized in MSL Ex. E for "Vickie" equal the same number of documents as the .55% in MSL Ex. D?
17. Please explain how you plan to use the categorization of documents in MSL Ex. E as part of your document review protocol in the Axcelerate system.
18. Are the document counts provided in MSL Ex. E reported on a post-deduplicated basis?

As we would like to move this process forward as quickly and cooperatively as possible, we are willing to schedule another call with our respective ESI consultants to discuss these issues further. Plaintiffs request that MSL provide a list of search term hits from custodians' mailboxes using the attached Exhibits 1 and 2 by Monday, December 5, 2011. After Plaintiffs receive a list of search term hits, the parties can work together to agree on a final search term and custodian list that will best retrieve the information relevant to this action. We look forward to resolving this issue promptly in order to move forward with discovery.

Best regards,

/s/ Janette Wipper

Janette Wipper

Encls.

Exhibit 1 – List of Custodians

	Last Name	First Name
1	Baskin	Robert
2	Beaudoin	Scott
3	Binkowski	David
4	Branam	Jud
5	Brennan	Nancy
6	Bryant	Steve
7	Carberry	Joseph
8	Chamberlain	David
9	Curran	Joel
10	Da Silva Moore	Monique
11	Denker	Kelly
12	Dhillon	Neil
13	Farnham	Kyle
14	Fite	Vicki
15	Fleurot	Olivier
16	Freund	Merrill
17	Gross	Meghan
18	Hass	Mark
19	Hannaford	Donald
20	Harris	Peter
21	Hughes	Keith
22	Hubbard	Zaneta
23	Kolhagen	Kelly
24	Lee	Don
25	Lilien	Tara
26	Lund	Wendy
27	Manning	Mike
28	Masini	Rita
29	Mayers	Laurie
30	Miller	Peter
31	Morsman	Michael
32	O'Donohue	MaryEllen
33	Orr	Bill
34	Perlman	Carol
35	Pierce	Heather
36	Shapiro	Maurey
37	Tsokanos	Jim
38	Wilkinson	Kate
39	Wilson	Renee

Exhibit 2 – List of Search Terms

adjust OR adjust*	fmla	perform OR perform*
advance OR advance*	freeze OR froze*	plan
apply OR applied OR	friedman	pmp
application	gender	prejudic*
approv*	"glass ceiling"	probation OR probation*
arens	guy OR guys	promot*
assess OR assess*	hall	pregnan*
award	harass OR harass*	raise OR raise*
baby OR babies	hausler	rationale
baker	hire OR hired OR hiring	recruit OR recruit*
balance OR balance*	hirson	region OR region*
bias OR bias*	hr OR human resources	reject OR reject*
bonus	incentive	relocat*
boy OR boys	increase OR increase*	remote
burgess	investig*	renard
caravetta	"jean-michel" OR etienne	reorg*, "re-org", "re-org*" OR
care	johnson	restruct*
central OR central*	kid OR kid*	resign OR resign*
chart	lawsuit OR suit	rogers
child OR child*	leader OR leader*	rosen
chipman	leave	salar*
comp OR compensation	levy	schneidau
complain OR complain*	marinelli	select*
common	market	sever*
commission	matern*	sex OR sex*
connor	mathias OR emmerich	showalter
critical	merit	single
"critical hire"	mcclean or mclean	son
daughter	mckenna	sullivan
discriminat*	merit	survey
divers*	"mission critical"	train OR train*
dorsey	mom OR mom* OR mother OR	transfer
donaldson	mother*	term OR term*
eeoc OR eeo OR "equal	money	trimble
employment"	morgan	unfair
equit*	nesselrodt	uniform
eval*	nominat*	vickery
exception	"o'kane" OR okane	wadia
fair	one	wage OR wage*
falcetti	org*	
family	overall	
farrell	pattern*	
flex OR flex*	pay OR paid	
"flight risk"	"part-time" OR "part time"	